

Exhibit 12

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1 Q. Did you ever do any work specifically
2 targeted to Java ME?
3 A. No.
4 Q. Did your work that you did do on Java benefit
5 Java ME? 10:45:48
6 A. I believe so.
7 Q. In what way?
8 A. Java ME derived from the platform formerly
9 known as Java, currently known as Java SE, and previously
10 known as -- I don't know -- J2SE. And so any work that 10:46:05
11 was done to improve Java SE that was then copied into
12 Java ME could be said to benefit Java ME.
13 Q. Is Java ME at least in part a subset of
14 the -- of Java SE?
15 A. I'm not sure what you mean by "in part a 10:46:33
16 subset."
17 Q. It could also be a superset; correct?
18 A. Right. To a mathematician, that's not a
19 subset. It's very different. You know, either it's a
20 subset or it isn't, and I believe it isn't. 10:46:43
21 Q. Are parts of Java SE excluded from Java ME?
22 A. Yes.
23 Q. And what are those parts?
24 A. I don't know. And keep in mind that there
25 are a multitude of platforms that are collectively 10:46:54
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1 you consider definitional, if you see this capability in
2 a version of Java, you know it's SE, and if you don't see
3 it, then you -- then you can presume it's ME?
4 MR. PURCELL: Object to the form.
5 MS. MC GLONE: Join. 10:48:49
6 THE WITNESS: I don't think so.
7 Q. BY MR. JACOBS: So if you looked at a
8 version -- at a set of features or -- actually, start
9 over.
10 If you looked at a set of APIs, would you be 10:49:02
11 able to form a judgment whether it was Java SE or
12 Java ME?
13 A. There are certain sets for which it is
14 impossible to form such a judgment. You know, if I see a
15 list of classes and, you know, those classes are 10:49:18
16 Java.lang.object and Java.lang.string, I have no idea
17 whether it's coming from ME or SE because those classes
18 are in both of them.
19 Q. How about the other end of the spectrum?
20 MR. PURCELL: Object to the form. 10:49:36
21 THE WITNESS: There are some classes that are
22 in SE and that are not in ME.
23 Q. BY MR. JACOBS: Such as?
24 A. I could guess, but I don't know offhand. I'm
25 not a Java ME guy. All I know is it's a lot smaller. 10:49:47
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1 referred to as Java ME, and different parts of Java SE
2 are excluded from different parts of Java ME.
3 Q. And when you say there are multiple platforms
4 that are referred to as Java ME, how are those platforms
5 referred to? 10:47:12
6 A. They have names like CLDC and MIDP. And this
7 is not my area of expertise so I can't name them all. I
8 can't even come close.
9 Q. In the JCP process, when you were serving as
10 spec lead, what version of Java were you targeting? 10:47:30
11 A. Initially, you know, Java SE, and by
12 extension, Java EE, which is a proper superset of
13 Java SE.
14 Q. And when you say "a proper superset," you
15 mean -- 10:47:53
16 A. It includes everything and more.
17 Q. It includes Java EE includes everything that
18 is in SE plus additional capability; is that correct?
19 A. Correct.
20 Q. And what is your understanding of what is -- 10:48:10
21 what functionality was excluded in the most feature-rich
22 version of Java ME from Java SE?
23 A. I really don't know.
24 MR. PURCELL: Object to the form.
25 Q. BY MR. JACOBS: Are there capabilities that 10:48:34
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1 Actually, there are some I could answer because I know
2 that it's based -- it doesn't include the Java 5 language
3 feature. So any classes that were added in support of
4 Java 5 language features, such as annotations are not
5 going to be present in Java ME. That is the support -- 10:50:06
6 the library support for the new language features.
7 Q. Which were one of the things you worked on?
8 A. Correct.
9 Q. And is it the case that the JCP necessarily
10 works on Java SE as opposed to ME functionality? 10:50:26
11 A. No.
12 Q. How does it happen? What's the process by
13 which something would be worked on in ME and not included
14 in SE, when we're talking about JCP specifications?
15 MR. PURCELL: Object to the form. 10:50:47
16 THE WITNESS: The JCP is divided into two
17 sub-bodies, one of which concerns itself exclusively with
18 Java ME, and any JSR concerning Java ME will be processed
19 through the Java ME EC.
20 Q. BY MR. JACOBS: And I take it you don't serve 10:51:14
21 in that -- on that body?
22 A. Correct.
23 Q. And that's one the reason you don't know a
24 lot of details about ME today?
25 A. I wouldn't say that. 10:51:29
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